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7 *Attorney for Plaintiff and the Putative Class*

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10
11 Devery Merlo, on behalf of herself and all others
12 similarly situated,

13 Plaintiff,

14 vs.

15 Water Wipes (USA), Inc.,

16 Defendants.

Case No. 3:25-cv-04640-EMC

**STIPULATION FOR EXTENSION OF
MOTION TO DISMISS BRIEFING
SCHEDULE**

Compl. Filed: June 2, 2025

Hon. Edward M. Chen

1 Plaintiff Devery Merlo (“Plaintiff”) and Defendant Water Wipes (USA), Inc. (“Defendants”)
2 (collectively, the “Parties”), by and through their respective counsel of record, respectfully submit this
3 stipulation to extend the briefing schedule regarding Defendant’s Motion to Dismiss.

4 WHEREAS, on June 2, 2025, Plaintiff filed her Complaint in the United States District Court
5 for the Northern District of California (ECF No. 1), captioned: *Devery Merlo, on behalf of herself and*
6 *all others similarly situated v. Water Wipes (USA), Inc.*, Case No. 3:25-cv-04640;

7 WHEREAS, on June 6, 2025, Defendant waived service of the Complaint (ECF No. 6);

8 WHEREAS, Defendant filed a Motion to Dismiss on August 5, 2025 (ECF No. 11);

9 WHEREAS, Plaintiff’s brief in Opposition is due August 19, 2025 and any reply brief by
10 Defendant is due August 26, 2025;

11 WHEREAS, the hearing date for the Motion to Dismiss has been set for September 11, 2025
12 at 1:30 PM in San Francisco, Courtroom 05, 17th Floor;

13 WHEREAS, the Case Management Statement is due by September 16, 2025, and the Initial
14 Case Management Conference is scheduled for September 23, 2025;

15 WHEREAS, to ensure that Plaintiff has adequate time to fully respond to Defendant’s Motion
16 to Dismiss, which contains multiple extensive arguments, the Parties have agreed to extend the
17 deadline for Plaintiff to respond to Defendant’s Motion to Dismiss by 30 days and reciprocally, to
18 extend Defendant’s deadline to file its Reply brief by 30 days.

19 WHEREAS, the Parties also stipulate to continue the hearing date for the Motion to Dismiss
20 until November 20, 2025, at 1:30 pm, extend the Case Management Statement deadline to January 6,
21 2025, and to continue the Initial Case Management Conference to January 13, 2025, at 1:30 pm.

22 IT IS THEREFORE STIPULATED TO AND AGREED BY THE PARTIES that Plaintiff to
23 respond to Defendant’s Motion to Dismiss on September 18, 2025 and Defendant file its Reply Brief
24 on October 27, 2025; and the hearing date for the Motion to Dismiss be November 20, 2025 at 1:30
25 pm, the Case Management Statement deadline be January 6, 2025, and the Initial Case Management
26 Conference be on January 13, 2025, at 1:30 pm.

1 DATED: August 8, 2025

Respectfully submitted,

2 **RICHMAN LAW & POLICY**

3 By: /s/ P. Renée Wicklund

4 P. Renée Wicklund (SBN 200588)

5 *Attorney for Plaintiff Amanda Schwartz, on behalf*
6 *of herself and all others similarly situated*

7 **KELLER AND HECKMAN LLP**

8 By: /s/ Rohit A. Sabnis

9 Rohit A. Sabnis (SBN 221465)

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14 *Attorney for Defendant*

[PROPOSED] ORDER

The Court, having considered the Stipulation for the Extension of the Motion to Dismiss Briefing Schedule and between Plaintiff Devery Merlo (“Plaintiff”) and Defendant Water Wipes (USA), Inc. (“Defendant”), the Declaration in Support, and good cause appearing, orders as follows::

1. Plaintiff is to respond to Defendant’s Motion to Dismiss on September 18, 2025;
2. Defendant is to file its Reply Brief on October 27, 2025;
3. The hearing date for the Motion to Dismiss is November 20, 2025, at 1:30 pm;
4. The Case Management Statement deadline is January 6, 2025;
5. The Initial Case Management Conference is on January 13, 2025, at 1:30 pm.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date:

THE HON. EDWARD M. CHEN

FILER'S ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, P. Renée Wicklund, attest that concurrence in the filing of this document has been obtained.

DATED: August 8, 2025

/s/ P. Renée Wicklund
P. Renée Wicklund